

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**BILL LAWRENCE, JR.,**

**Defendant.**

**Case No. 18-MJ-2003-DPR**

**MOTION FOR DETENTION**

Comes now the United States of America, by and through Timothy A. Garrison, United States Attorney for the Western District of Missouri, and the undersigned Assistant United States Attorney, and hereby moves this Court to order the detention of the defendant, **BILL LAWRENCE, JR.**, and states the following in support of the motion:

1. A complaint has been filed charging the defendant with receipt and distribution of child pornography, in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1).
2. Title 18, United States Code, Section 3142(f) provides, in pertinent part, that a hearing must be held by the appropriate judicial officer to determine whether any condition or combination of conditions “will reasonably assure the appearance of such person as required and the safety of any other person and the community” if the attorney for the Government moves for such a hearing and the case involves:

“(E) any felony that is not otherwise a crime of violence that involves a minor victim... .”

3. Title 18, United States Code, Section 3142(e) mandates, subject to rebuttal, “it shall be presumed that no conditions or combination of conditions will reasonably assure the appearance of a person as required and the safety of the community if the judicial officer finds that there is probable cause to believe that there is probable cause to believe that the person committed—(E) an offense involving a minor victim under section 2252(a)(2)... of this title.”
4. The defendant initially came to the attention of law enforcement after Google submitted Cyber tips regarding the defendant’s use of its services to distribute and possess images depicting child pornography. Imagery submitted in the Cyber tips depicted prepubescent children being sexually victimized.
5. A search warrant, issued by this Court, was executed upon the defendant’s home on January 9, 2018.
6. The defendant confessed to receiving and distributing child pornography using the Internet.
7. A forensic examination of the defendant’s cellular telephone yielded the discovery of multiple images depicting child pornography
8. The defendant is a convicted sex offender.
9. This case involves a minor victim. See 18 U.S.C. § 3142(g)(1).
10. The evidence against the defendant is overwhelming. See 18 U.S.C. § 3142(g)(2).

Wherefore, based upon the foregoing, the United States submits that there is clear and convincing evidence that there are no conditions which the Court could place upon the defendant that would reasonably assure the defendant's appearance in Court and the safety of the community. The Government therefore requests that a detention hearing be held and that the defendant be detained pending trial of this matter.

Respectfully submitted,

Timothy A. Garrison  
United States Attorney

By: /s/ James J. Kelleher  
James J. Kelleher  
Assistant United States Attorney  
Missouri Bar No. 51921

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on January 10, 2018, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ James J. Kelleher

James J. Kelleher

Assistant United States Attorney